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September 3, 2015

VIA ECF AND FEDERAL EXPRESS

Honorable Deborah A. Batts
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 24B
New York, NY 10007-1312

Re: BDO - Class Actions

Dear Judge Batts:

We represent the BDO defendants. Your most recent order required that we submit a further memorandum concerning the application of SLUSA in light of recent Second Circuit precedent and concerning issues of subject matter jurisdiction by September 18. With the concurrence of counsel for class plaintiffs, we request a thirty day adjournment, as the parties are discussing a possible resolution and, in addition, I will be out of the country for the next week and a half. This is the BDO defendants' first request for an adjournment of this date.

Thank you for your consideration.

Respectfully,

A handwritten signature in blue ink that reads "Ira G. Greenberg/kmc".

Ira G. Greenberg

cc: All counsel (via ECF)

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